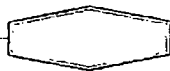


6-6-94  
12.3.8 v.6

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

Date: June 6, 1994

To: Ken Rone

From: Gerald J. Brown

Subject: Storm water discharge  
permit

Copy: Ken Rone  
Ed Pierce  
Ben McBride

Per your request regarding the need for a storm water discharge permit for the Seattle Plant, I contacted Mr. Baz Stevens Industrial Waste Investigator for METRO Water Pollution Control Department to obtain documentation to determine the actual point of discharge for the plant's storm and process water. As you recall, Mr. Stevens conducted a site inspection February 3, 1993 and was also questioned at that time by Ralph Jones regarding storm water discharge. Mr. Stevens responded that the facility's water drains into METRO's combined sewer. There is no separate storm water discharge line that would require a NPDES permit.

In a conversation on 5/31/94, Baz Stevens stated that there have been no changes to the sewer system that requires Ash Grove to obtain a storm water discharge NPDES permit. The storm water along with process water (truck wash) and sewage is permitted under waste discharge authorization number 296 to be discharged into metro's combined sewer (see attached). Mr. Stevens pointed to this permit as documentation that we are connected to the combined sewer system and authorized to discharge into it until the permit expires on 7/3/96. The attached METRO map provided by Mr. Stevens shows the current locations of the combined and storm sewer systems. He has cited this map as showing that the facility is discharging to a combined sewer. I will seek further clarification on the Metro map as it is vague to me. Additionally, Dan Cargill, WaDOE, was also contacted and is satisfied that Baz Stevens is correct and that a NPDES permit is not required at this time.

I again mention that since Metro is trying to reduce volumes, we will probably be requested upon application for renewal in 1996 to justify the storm and process water discharge to the combined sewer since we have close access to the Duwamish. A NPDES permit may be forced upon us.

USEPA SF



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